



10/16/2026

Wendy Myers
Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0180010167
Permit Number: P0141263
Permit Type: Renewal
County: Union

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search | Ohio Environmental Protection Agency](#). The permit can also be commented on and accessed electronically at: <https://ohioepa.commentinput.com>. Search by entering the permit # (P0141263) in the "Search Projects" search box and selecting "Review Document" or "Draft Permit." Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and
Ohio EPA DAPC, Central District Office
50 West Town St. Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614) 644-2270.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal

Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

ID#: P0141263

Date of Action: 10/16/2026

Permit Desc: FEPTIO renewal for an existing facility that coats metal and fiberglass.

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit P0141263 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☐ Synthetic Minor Determination

☐ Netting Determination

☒ Renewal SM FEPTIO

2. Source Description:

Precision Coating Systems, Inc. is requesting a renewal of their federally enforceable permit-to-install and operate. No operational changes have occurred since the last permit was issued. The facility coats metal and fiberglass. The renewal covers , (K001-K002) spray booths, (K003, K004, K006) spray booth with drying oven and (P001) paint mixing room. The paint spray booths utilize filters for control.

3. Facility Emissions and Attainment Status:

Precision Coating Systems, Inc. is located at 948 Columbus Ave, Marysville, Ohio 43040. Precision Coating Systems, Inc. is located in Union county which is currently in attainment for all NAAQ criteria pollutants. The facility operated under federally enforceable limitations to avoid classification as a major source under Toxic Review and MACT HHHHHH – Area Sources: Paint Stripping and Misc. Surface Coating.

The facility emissions are limited by a synthetic minor limit of 30.02 tons VOC per rolling, 12-month period from coatings and clean-up materials. This is achieved through the following operational restrictions: 8,750 gallons of coating per rolling 12-month period, 350 gallons of clean-up material per rolling 12-month period, VOC content of coating not to exceed 6.59 lb VOC/gal as applied, and VOC content of clean-up material not to exceed 6.8 lb VOC/gal as applied.

The facility combined with the nearby facility 0180010401 are limited to combined facilities-wide limits of 9.9 tons of an individual HAP and 24.9 tons of all combined HAPs. This facility also has an operational restriction that limits the maximum individual HAP content of coatings to 1.45 lb HAP/gal.

Table 1 Facility Wide PTE: (in ton/yr) based on federally enforceable limitations.

	2021 Renewal	2026 Renewal
Requested annual coating limit	10,000 gal	8,750 gal
Permitted (not requested) total coating usage in P101	5,000 gal r12m	5,000 gal r12m



Solvent for cleaning	350 gal max 6.8 lb OC/gal	350 gal max 6.8 lb OC/gal
Coating max OC content	6.57 lb/gal	6.59 lb/gal
OC PTE	34.04 tons OC	30.02 tons OC
Coating max IHAP content	1.22 lb/gal	1.45 lb/gal
Coating max THAP content	2.97 lb/gal	2.01 lb/gal
iHAP PTE	6.1 tons iHAP	6.34 tons iHAP
iHAP including other facility 0180010401	9.15 iHAP	9.97 Ihap (permit 9.9 TPY)
tHAP PTE	14.85 tHAP	8.79 tHAP
tHAP including other facility 0180010401	22.3 tHAP	13.82 tHAP (permit 24.9 TPY)

4. Source Emissions:

P001: Organic compounds (OCs), VOCs, HAPs

K001 and K002: OCs, VOCs, HAPs, Visible Emissions (VEs), Particulate Emissions (PEs)

K003 and K004 Emissions: OCs, VOCs, HAPs, VEs, PEs, nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂)

- VOC emissions shall not exceed 26.78 pounds per hour from all coatings and clean-up materials employed in K001, K002, K003, K004, K006, each.
 - Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:
 - Coating material usage = maximum hourly usage (2 gal/hr)
 - VOC content of coating = maximum VOC content (6.59 lb VOC/gal)
 - Clean-up material usage = maximum hourly usage (2 gal/hr)
 - VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)
 - (2 gal/hr * 6.59 lb VOC/gal) + (2 gal/hr * 6.8 lb VOC/gal) = 26.78 lb VOC/hr

- VOC emissions shall not exceed 17.67 tons per year from all coatings and clean-up materials employed in K001, K002, K003, K004, K006, each.
 - Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})] / (2,000 \text{ lb/ton})$, where:
 - Coating material usage = maximum annual usage (5,000 gal)
 - VOC content of coating = maximum VOC content (6.59 lb VOC/gal)
 - Clean-up material usage = maximum annual usage (350 gal)
 - VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)
 - $[(5000 \text{ gal} \times 6.59 \text{ lb VOC/gal}) + (350 \text{ gal} \times 6.8 \text{ lb VOC/gal})] / 2000 \text{ lbs} = 17.67 \text{ TPY VOC}$
 - K001, K002, K003, K004 PE emissions shall not exceed 0.156 tons per year.
 - $E = \text{coating material usage} \times \text{solids content} \times (1 - \text{TE}) \times (1 - \text{CE}) / (2,000 \text{ lb/ton})$, where:
 - Coating material usage = maximum coating usage (5,000 gal/yr)
 - Solids content = maximum solids content (8.31 lb solids/gal)
 - TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5%)
 - CE = control efficiency of the control equipment (assumed to be 98%)
 - $5,000 \text{ gal} \times 8.31 \times (1 - 0.625) \times (1 - 0.98) / 2000 \text{ lb/ton} = 0.156 \text{ TPY PE}$
 - Facility Wide: 30.02 TPY VOC
 - P001 : VOC emissions shall not exceed 4.07 tons per year from all coatings mixed and clean-up materials employed in this emissions unit.
 - Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating}) \times (\text{EF})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})] / (2,000 \text{ lb/ton})$, where:
 - Coating material usage = maximum annual usage (8,750 gal)
 - VOC content of coating = maximum VOC content (6.59 lb VOC/gal)
 - EF = emission factor for evaporative losses from paint mixing (0.1 lb VOC/lb VOC in gallon)
 - Clean-up material usage = maximum annual usage (350 gal)
 - VOC content of clean-up material = maximum VOC content [(6.8 lb VOC/gal)
 - $(8750 \times 6.59 \times 0.1) + (350 \times 6.8) / 2000 = 4.07 \text{ TPY VOC}$
5. Conclusion:
- The terms and conditions contained within P0141263 are sufficient to ensure compliance with all state and federal regulations and are consistent with current Division of Air Pollution Control policy and guidelines. Due to the reduced coating limit, it is recommended that this permit be issued draft to ensure federal enforceability.
6. Please provide additional notes or comments as necessary:
- Updated T/C language from library.
 - Added VE check language and PER reporting language to booths via T/C library VE.Stk.Std for K001-K004, and K006



- Updated Modeling MAGLC values with 2026 modeling data.
 - Maximum Hourly Emissions Rate (lb/hr) from $2.44 \times 6 \text{ EU's} = 14.64$ to $2.90 \times 6 \text{ EU's} = 17.4$
 - Modeled maximum concentration ($\mu\text{g}/\text{m}^3$) from 1,196 to 1,420

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Individual HAP*	9.9 TPY
Combined HAPs*	24.9 TPY
VOC	30.02 TPY
PE	0.945
NO _x	2.2
SO ₂	0.013
CO	0.46

* These allowable limits are for 0180010167 and 0180010401 combined.



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

Facility ID:	0180010167
Permit Number:	P0141263
Permit Type:	Renewal
Issued:	10/16/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Precision Coating Systems, Inc.

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Authorization

Facility ID: 0180010167
Application Number(s): A0082383A0082383
Permit Number: P0141263
Permit Description: FEPTIO renewal for an existing facility that coats metal and fiberglass.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/16/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report
(PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Precision Coating Systems, Inc.
948 Columbus Ave
Marysville, OH 43040

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town St. Suite 700
P.O. Box 1049
Columbus, OH 43216-1049
(614) 644-2270

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number: P0141263

Permit Description: FEPTIO renewal for an existing facility that coats metal and fiberglass.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Downdraft Booth #1
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Downdraft Booth #2
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Booth #3
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Booth #4
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	Booth #6
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Mixing Room
Superseded Permit Number:	P0130643
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.



15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2. through B.6.
2. In accordance with OAC rule 3745-31-05(D) to avoid Title V, the combined facility-wide (from premise numbers 0180010167 and 0180010401) emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title I of the Clean Air Act, from all emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
3. Operational Restrictions
 - a) The total coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167 shall not exceed 8,750 gallons per rolling, 12-month period.
 - b) The total coating usage in emissions units K101 and P001 at facility 0180010401 shall not exceed 5,000 gallons per rolling, 12-month period.
4. Monitoring and/or Recordkeeping Requirements
 - a) The permittee shall maintain monthly records of the following information:
 - (1) the total gallons of coating employed in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167;
 - (2) the total gallons of coating employed in emissions units K101 and P001 at facility 0180010401;
 - (3) the combined facility-wide (from premise numbers 0180010167 and 0180010401) individual HAP emissions, in tons per month;
 - (4) the combined facility-wide (from premise numbers 0180010167 and 0180010401) combined HAPs emissions, in tons per month;
 - (5) the rolling, 12-month summation of coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167, in gallons;
 - (6) the rolling, 12-month summation of coating usage in emissions units K101 and P001 at facility 0180010401, in gallons;



- (7) the rolling, 12-month summation of combined facility-wide (from premise numbers 0180010167 and 0180010401) individual HAP emissions, in tons; and
- (8) the rolling, 12-month summation of combined facility-wide (from premise numbers 0180010167 and 0180010401) combined HAPs emissions, in tons.

5. Reporting Requirements

- a) The reports required by this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard Terms and Conditions.
- b) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification, or report is considered *submitted* on the date the submittal is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- c) The permittee shall submit quarterly deviation (excursion) reports for the following EUs that identify:
 - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - (a) all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001, K002, K003, K004, K006 and P001 at facility 0180010167;
 - (b) all exceedances of the rolling, 12-month limitation of coating usage in emissions units K101 and P001 at facility 0180010401;
 - (c) all exceedances of the rolling, 12-month individual HAP emission limitation; and
 - (d) all exceedances of the rolling, 12-month combined HAPs emission limitation.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

6. Ohio EPA has determined that this facility operates affected sources subject to the requirements of 40 CFR Part 63, Subpart HHHHHH, NESHAP for Area Sources: Paint Stripping and Miscellaneous Surface Coating Operations. Ohio EPA is not accepting the delegation of authority to implement and enforce the area source NESHAP standard; therefore, the area source NESHAP standard is implemented and enforced by U.S. EPA, Region 5. The promulgated version of this NESHAP standard and the 40 CFR Part 63, General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <https://www.ecfr.gov> or by contacting the appropriate Ohio EPA DO/LAA.

The following affected sources are subject to the area source requirements of this NESHAP standard: K001-K004, K006, P001.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group – Spray Booths: K001 and K002

EU ID	Operations, Property and/or Equipment Description
K001	One of two first stage spray booths (booth #1), coating of misc metal or fiberglass, with arrestor filters
K002	Second of two first stage spray booths (booth #2), coating of misc metal or fiberglass, with arrestor filters

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., d)(10) through d)(13), and e)(4)

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e., c)(4) through c)(8), d)(8), d)(9), e)(2), and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as provided by rule. See d)(14) and e)(1)a. below.
b.	OAC rule 3745-17-11(C)	See c)(1), (c)(2), and d)(1) through d)(5) below.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
d.	OAC rule 3745-31-05(A)(3) [Best available technology for VOC and PE]	Volatile organic compound (VOC) emissions shall not exceed 26.78 pounds per hour and 17.67 tons per year from all coatings and clean-up materials employed in K001 and K002, each.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate emissions (PE) shall not exceed 0.156 tons per year. See b)(2)b. and c)(3) below.
e.	OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V]	VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.6. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below.
f.	ORC 3704.03(F)(3)(c) and (F)(4) OAC rule 3745-114-01 [Toxic Air Contaminant Statute]	See d)(10) through d)(13) and e)(4) below.

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- b. The hourly and annual VOC and PE limits were established to reflect the potentials-to-emit for K001 and K002, taking into account the facility-wide restriction of 8,750 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.



- (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 8,750 gallons per rolling, 12-month period.
 - (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
 - (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.59 pounds VOC per gallon, as applied.
 - (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
 - (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.45 pounds HAP per gallon, as applied.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
 - (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record



of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (6) The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed; and
 - c. The total volume, in gallons, of all coatings employed.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions units K001 and K002, individually.
- (8) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied for emissions units K001-K004, K006, and P001:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each coating applied or the maximum VOC content of all the coatings applied, in pound(s) per gallon;
 - c. the total VOC emissions from all coatings applied, that is, the summation of the products of "a" times "b" for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, that is, "a" times "b" for the worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pound(s) per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions rate from all cleanup materials, that is, the summation of the products of "e" times "f" for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, that is, the sum of "c" and "g".
 - i. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - j. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that are applied in the EU:
 - a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;



- b. The name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
- c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
- d. For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;
- e. The total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;
- f. For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the CAA, as revised under 40 CFR Part 63 Subpart C, or can be obtained by contacting your Ohio EPA DO/LAA contact. MSDSs typically include a listing of the solvents contained in the coatings and cleanup materials.

- (10) The FEPTIO application for EUs K001-K004, K006 and P001, combined, was evaluated based on the actual materials and the design parameters of the EUs’ exhaust system(s), as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A,” as follows:
- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices and in the following order of preference:
 - i. TLV shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.



- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant(s) (emitted at 1 TPY or more) or *worst-case* scenario:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 17.40

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,420

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (11) Prior to making any physical changes to or changes in the method of operation of the EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the EUs or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If



each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EUs described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (12) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
- A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EUs or the materials applied.
- (13) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (14) The permittee shall perform daily checks, when the EU is in operation and when the weather conditions allow, for any VE from the stack(s) serving this EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
- The color of the emissions;
 - Whether the emissions are representative of normal operations;
 - If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - The total duration of any VE incident; and
 - Any corrective actions taken to minimize or eliminate the VE.



If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under d)(14) above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations or specify the corrective actions that were taken to minimize or eliminate abnormal VE.

e) Reporting Requirements

- (1) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - a. The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for VE in d)(14) above:
 - i. All days during which any VE were observed from the stack(s) serving this EU; and
 - ii. Any corrective actions taken to minimize or eliminate the VE.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October



31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (3) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 45 days after the exceedance occurs.
- (4) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, EUs or the exhaust stack(s) have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack VE limitation shall be determined through VE observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, and OAC rule 3745-17-03(B)(1)(a).

b. Emissions Limitation

VOC emissions shall not exceed 26.78 pounds per hour from all coatings and clean-up materials employed in K001 and K002, each.

Applicable Compliance Method

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:

Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

Coating material usage = maximum hourly usage (2 gal/hr)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum hourly usage (2 gal/hr)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)



c. Emissions Limitation

VOC emissions shall not exceed 17.67 tons per year from all coatings and clean-up materials employed in K001 and K002, each.

Applicable Compliance Method

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})] / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum annual usage (5,000 gal)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation

PE shall not exceed 0.156 tons per year.

Applicable Compliance Method

The annual emissions limitation was established to reflect the actual worst-case annual particulate emissions rate (E) using the following equation for the paint spraying operations:

$E = \text{coating material usage} \times \text{solids content} \times (1-TE) \times (1-CE) / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum coating usage (5,000 gal/yr)

Solids content = maximum solids content (8.31 lb solids/gal)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

e. Emissions Limitation

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group - Spray Booths with Internal Ovens: K003 and K004

EU ID	Operations, Property and/or Equipment Description
K003	Spray booth (booth #3) for the application of a top coat and a clear coat to misc metal or fiberglass with arrestor filters and serviced by a central oven and an internal oven as a back up
K004	Spray booth (booth #4), coating of misc metal or fiberglass, with arrestor filters and serviced by an internal oven

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g., d)(10) through d)(13), and e)(4).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)f., c)(4) through c)(8), d)(8), d)(9), e)(2), and f)(1)g.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as provided by rule. See d)(14) and e)(1)a. below.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(1) through d)(5) below.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(A)(3) [Best available technology for VOC and PE]	Volatile organic compound (VOC) emissions shall not exceed 26.78 pounds per hour and 17.67 tons per year from all coatings and clean-up materials employed in K003 and K004, each. PE from all coatings and clean-up materials employed in emissions units K003 and K004, each, shall not exceed 0.156 tons per year. Emissions from the internal ovens shall not exceed the following limits. For K003: 0.023 lb PE/hr and 0.099 ton PE/yr 0.30 lb NO_x/hr and 1.314 tons NO_x/yr 0.252 lb CO/hr and 1.104 tons CO/yr 0.002 lb SO₂/hr and 0.008 ton SO₂/yr For K004: 0.015 lb PE/hr and 0.066 ton PE/yr 0.20 lb NO_x/hr and 0.876 ton NO_x/yr 0.168 lb CO/hr and 0.736 ton CO/yr 0.001 lb SO₂/hr and 0.005 ton SO₂/yr See b)(2)b. and c)(3) below.
f.	OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V]	VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.6. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	ORC 3704.03(F)(3)(c) and (F)(4) OAC rule 3745-114-01 [Toxic Air Contaminant Statute]	See d)(10) through d)(13) and e)(4) below.

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- b. The hourly and annual VOC and PE limits were established to reflect the potentials-to-emit for K003 and K004, taking into account the facility-wide restriction of 8,750 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.
- (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 8,750 gallons per rolling, 12-month period.
- (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
- (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.59 pounds VOC per gallon, as applied.
- (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
- (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.45 pounds HAP per gallon, as applied.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed; and
 - c. The total volume, in gallons, of all coatings employed.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions units K003 and K004, individually.



- (8) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied for emissions units K001-K004, K006, and P001:
- a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each coating applied or the maximum VOC content of all the coatings applied, in pound(s) per gallon;
 - c. the total VOC emissions from all coatings applied, that is, the summation of the products of “a” times “b” for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, that is, “a” times “b” for the worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pound(s) per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions rate from all cleanup materials, that is, the summation of the products of “e” times “f” for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, that is, the sum of “c” and “g”.
 - i. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - j. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that are applied in the EU:
- a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. The name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;
 - e. The total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;



- f. For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the CAA, as revised under 40 CFR Part 63 Subpart C, or can be obtained by contacting your Ohio EPA DO/LAA contact. MSDSs typically include a listing of the solvents contained in the coatings and cleanup materials.

- (10) The FEPTIO application for EUs K001-K004, K006 and P001, combined, was evaluated based on the actual materials and the design parameters of the EUs’ exhaust system(s), as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A,” as follows:

- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices and in the following order of preference:

- i. TLV shall be used, if the chemical is listed; or
- ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.

- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant(s) (emitted at 1 TPY or more) or *worst-case* scenario:



Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 17.40

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,420

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (11) Prior to making any physical changes to or changes in the method of operation of the EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - Physical changes to the EUs or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EUs described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (12) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
- A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for



example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).

- b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EUs or the materials applied.
- (13) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (14) The permittee shall perform daily checks, when the EU is in operation and when the weather conditions allow, for any VE from the stack(s) serving this EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
- a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any VE incident; and
 - e. Any corrective actions taken to minimize or eliminate the VE.

If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under d)(14) above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations or specify the corrective actions that were taken to minimize or eliminate abnormal VE.

e) Reporting Requirements

- (1) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.



- a. The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for VE in d)(14) above:
 - i. All days during which any VE were observed from the stack(s) serving this EU; and
 - ii. Any corrective actions taken to minimize or eliminate the VE.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.
- (3) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 45 days after the exceedance occurs.
- (4) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, EUs or the exhaust stack(s) have been made, then the report shall include a statement to this effect.



f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack VE limitation shall be determined through VE observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, and OAC rule 3745-17-03(B)(1)(a).

b. Emissions Limitation

PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.

Applicable Compliance Method

If required, compliance with the PE emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation

VOC emissions shall not exceed 26.78 pounds per hour from all coatings and clean-up materials employed in K003 and K004, each.

Applicable Compliance Method

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:

Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

Coating material usage = maximum hourly usage (2 gal/hr)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum hourly usage (2 gal/hr)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation

VOC emissions shall not exceed 17.67 tons per year from all coatings and clean-up materials employed in K003 and K004, each.



Applicable Compliance Method

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = $[(\text{coating material usage}) \times (\text{VOC content of coating})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})] / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum annual usage (5,000 gal)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

e. Emissions Limitation

PE from all coatings and clean-up materials employed in emissions units K003 and K004, each, shall not exceed 0.156 tons per year.

Applicable Compliance Method

The annual emissions limitation was established to reflect the actual worst-case annual particulate emissions rate (E) using the following equation for the paint spraying operations:

$E = (\text{coating material usage}) \times (\text{solids content}) \times (1-TE) \times (1-CE) / (2,000 \text{ lb/ton})$, where:

Coating material usage = maximum coating usage (5,000 gal/yr)

Solids content = maximum solids content (8.31 lb solids/gal)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (62.5%)

CE = control efficiency of the control equipment (assumed to be 98%)

If required, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emissions Limitation

Emissions from the internal ovens shall not exceed the following limits.

For K003:

0.023 lb PE/hr and 0.099 ton PE/yr

0.30 lb NO_x/hr and 1.314 tons NO_x/yr

0.252 lb CO/hr and 1.104 tons CO/yr



0.002 lb SO₂/hr and 0.008 ton SO₂/yr

For K004:

0.015 lb PE/hr and 0.066 ton PE/yr

0.20 lb NO_x/hr and 0.876 ton NO_x/yr

0.168 lb CO/hr and 0.736 ton CO/yr

0.001 lb SO₂/hr and 0.005 ton SO₂/yr

Applicable Compliance Method

Compliance with the hourly emissions limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003 and 2.0 MMBtu/hr for K004) by the emission factor from AP-42, Fifth Edition, Section 1.4, Tables 1.4-1 and 1.4-2 (revised 7/98) for the combustion of natural gas (0.0075 lb PE/MMBtu, 0.10 lb NO_x/MMBtu, 0.084 lb CO/MMBtu, and 0.0006 lb SO₂/MMBtu). The annual emissions limitations are the potentials-to-emit based on the allowable hourly emission rates multiplied by 8,760 hr/yr and divided by 2,000 lb/ton.

If required, the permittee shall demonstrate compliance with the hourly limitations in accordance with Methods 1-5, 7, 10, and 19 in 40 CFR Part 60 Appendix A.

g. Emissions Limitation

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

g) **Miscellaneous Requirements**

- (1) None.

3. K006, Booth #6

Operations, Property and/or Equipment Description:

Booth #6, paint spray booth with HVLP spray gun, drying oven and filter

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g., d)(10) through d)(13), and e)(4)

- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)f., c)(4) through c)(8), d)(8), d)(9), e)(2), and f)(1)f.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as provided by rule. See d)(14) and e)(1)a. below.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(1) through d)(5) below.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
e.	OAC rule 3745-31-05(A)(3) [Best available technology for VOC]	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.78 pounds per hour and 17.67 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). See b)(2)b. and c)(3) below.
f.	OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V]	VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.6. of the Facility-Wide Terms and Conditions above and c)(4) through c)(8) below.
g.	ORC 3704.03(F)(3)(c) and (F)(4) OAC rule 3745-114-01 [Toxic Air Contaminant Statute]	See d)(10) through d)(13) and e)(4) below.

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than 10 gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- b. The hourly and annual VOC limits were established to reflect the potentials-to-emit, taking into account the facility-wide restriction of 8,750 gallons coating and 350 gallons clean-up materials used per rolling, 12-month period.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed



necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

- (3) For each emissions unit, coating usage shall not exceed 417 gallons per month.
 - (4) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 8,750 gallons per rolling, 12-month period.
 - (5) The usage of clean-up materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 350 gallons per rolling, 12-month period.
 - (6) The VOC content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 6.59 pounds VOC per gallon, as applied.
 - (7) The VOC content of clean-up materials employed in emissions units K001-K004, K006, and P001 shall not exceed 6.8 pounds VOC per gallon, as applied.
 - (8) The individual HAP content of coatings employed in emissions units K001-K004, K006, and P001 shall not exceed 1.45 pounds HAP per gallon, as applied.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
 - (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.



These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed;
 - b. The volume, in gallons, of each coating employed; and
 - c. The total volume, in gallons, of all coatings employed.
- (7) The permittee shall maintain monthly records of the total gallons of coatings employed in emissions unit K006.
- (8) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied for emissions units K001-K004, K006, and P001:
 - a. the number of gallons of each coating applied or all coatings applied during the month;
 - b. the maximum VOC content for each coating applied or the maximum VOC content of all the coatings applied, in pound(s) per gallon;
 - c. the total VOC emissions from all coatings applied, that is, the summation of the products of "a" times "b" for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, that is, "a" times "b" for the worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pound(s) per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions rate from all cleanup materials, that is, the summation of the products of "e" times "f" for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, that is, the sum of "c" and "g".
 - i. the rolling, 12-month summation of coating usage in emissions units K001-K004, K006, and P001, combined, in gallons; and
 - j. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.



- (9) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that are applied in the EU:
- a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. The name/identification of each individual HAP contained in each material applied (and identified in “a” above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;
 - e. The total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;
 - f. For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and
 - g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).
- ¹A listing of the HAPs can be found in Section 112(b) of the CAA, as revised under 40 CFR Part 63 Subpart C, or can be obtained by contacting your Ohio EPA DO/LAA contact. MSDSs typically include a listing of the solvents contained in the coatings and cleanup materials.
- (10) The FEPTIO application for EUs K001-K004, K006 and P001, combined, was evaluated based on the actual materials and the design parameters of the EUs’ exhaust system(s), as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A,” as follows:
- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices and in the following order of preference:



- i. TLV shall be used, if the chemical is listed; or
- ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant(s) (emitted at 1 TPY or more) or *worst-case* scenario:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 17.40

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,420

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (11) Prior to making any physical changes to or changes in the method of operation of the EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the EUs or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EUs described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (12) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EUs or the materials applied.
- (13) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (14) The permittee shall perform daily checks, when the EU is in operation and when the weather conditions allow, for any VE from the stack(s) serving this EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
- a. The color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. The total duration of any VE incident; and
- e. Any corrective actions taken to minimize or eliminate the VE.

If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under d(14) above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations or specify the corrective actions that were taken to minimize or eliminate abnormal VE.

e) Reporting Requirements

- (1) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - a. The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for VE in d)(14) above:
 - i. All days during which any VE were observed from the stack(s) serving this EU; and
 - ii. Any corrective actions taken to minimize or eliminate the VE.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.



The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (3) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA DO/LAA within 45 days after the exceedance occurs.
- (4) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, EUs or the exhaust stack(s) have been made, then the report shall include a statement to this effect.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VE from any stack serving this EU shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack VE limitation shall be determined through VE observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, and OAC rule 3745-17-03(B)(1)(a).

b. Emissions Limitation

PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven associated with this emissions unit.

Applicable Compliance Method

If required, compliance with the PE emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitation

VOC emissions shall not exceed 26.78 pounds per hour from all coatings and clean-up materials employed in this emissions unit.

Applicable Compliance Method

The hourly emissions limitation was established to reflect the potential to emit based on the information provided in the permit application as follows:



Hourly VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)], where:

Coating material usage = maximum hourly usage (2 gal/hr)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum hourly usage (2 gal/hr)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

d. Emissions Limitation

VOC emissions shall not exceed 17.67 tons per year from all coatings and clean-up materials employed in this emissions unit.

Applicable Compliance Method

The annual emissions limitation was established to reflect the potential to emit, taking into account the monthly gallon usage restriction as follows:

Annual VOC emissions = [(coating material usage) x (VOC content of coating)] + [(clean-up material usage) x (VOC content of clean-up material)] / (2,000 lb/ton), where:

Coating material usage = maximum annual usage (5,000 gal)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)

e. Emissions Limitation

Emissions from the internal ovens shall not exceed the following limits:

0.015 lb PE/hr and 0.066 ton PE/yr

0.20 lb NO_x/hr and 0.876 ton NO_x/yr

0.168 lb CO/hr and 0.736 ton CO/yr

0.001 lb SO₂/hr and 0.005 ton SO₂/yr

Applicable Compliance Method

Compliance with the hourly emissions limitations shall be determined by multiplying the maximum hourly MMBtu capacity of the emissions unit (3.0 MMBtu/hr for K003 and 2.0 MMBtu/hr for K004) by the emission factor from AP-42, Fifth Edition, Section 1.4, Tables 1.4-1 and 1.4-2 (revised 7/98) for the combustion of natural gas (0.0075 lb PE/MMBtu, 0.10 lb NO_x/MMBtu, 0.084 lb CO/MMBtu, and 0.0006 lb SO₂/MMBtu). The annual emissions limitations are the potentials-to-emit based on the allowable hourly emission rates multiplied by 8,760 hr/yr and divided by 2,000 lb/ton.



If required, the permittee shall demonstrate compliance with the hourly limitations in accordance with Methods 1-5, 7, 10, and 19 in 40 CFR Part 60 Appendix A.

f. Emissions Limitation

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(8) above.

g) Miscellaneous Requirements

(1) None.



4. P001, Mixing Room

Operations, Property and/or Equipment Description:

Paint mixing room

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. b)(1)c., d)(4) through d)(7), and e)(3)
- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b., c)(1), d)(1), d)(2), e)(2), and f)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [Best available technology for VOC]	Volatile organic compound (VOC) emissions shall not exceed 4.07 tons per year from all coatings mixed and clean-up materials employed in this emissions unit. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-31-05(D) [Federally enforceable restriction to avoid Title V]	VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions. See B.2. through B.6. of the Facility-Wide Terms and Conditions above and c)(1) below.
c.	ORC 3704.03(F)(3)(c) and (F)(4) OAC rule 3745-114-01	See d)(4) through d)(7) and e)(3) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[Toxic Air Contaminant Statute]	

(2) Additional Terms and Conditions

- a. The hourly and annual VOC limits were established to reflect the potentials-to-emit, taking into account the facility-wide restriction of 8,750 gallons coating used per rolling, 12-month period. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The usage of coating materials for emissions units K001-K004, K006, and P001, combined, shall not exceed 8,750 gallons per rolling, 12-month period. The usage of coating materials in emissions unit P001 is included in the coating materials used in K001-K004 and K006.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the total gallons of coatings mixed in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit for the purpose of demonstrating compliance with the federally enforceable restriction on VOC emissions:
 - a. the identification of each coating and clean-up material mixed;
 - b. the total number of gallons of each coating and clean-up material mixed;
 - c. the VOC content of each coating and clean-up material mixed, in pounds per gallon;
 - d. the total VOC emissions from all coatings and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons per month;
 - e. the rolling, 12-month summation of VOC emissions from all coating and clean-up materials employed in emissions units K001-K004, K006, and P001, combined, in tons.
- (3) The permittee shall collect and record the following information each month for all materials containing any HAP¹ that are applied in the EU:
 - a. The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. The name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;



- d. For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of “b” times “c” for all the materials applied during the month, divided by 2,000 pounds;
- e. The total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from “d” above;
- f. For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in “d” above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in “e” above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the CAA, as revised under 40 CFR Part 63 Subpart C, or can be obtained by contacting your Ohio EPA DO/LAA contact. MSDSs typically include a listing of the solvents contained in the coatings and cleanup materials.

- (4) The FEPTIO application for EUs K001-K004, K006 and P001, combined, was evaluated based on the actual materials and the design parameters of the EUs’ exhaust system(s), as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A,” as follows:
 - a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from the American Conference of Governmental Industrial Hygienists “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices and in the following order of preference:
 - i. TLV shall be used, if the chemical is listed; or
 - ii. Short-term exposure limit (STEL) or the ceiling value; the STEL is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
 - b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
 - c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
 - d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant(s) (emitted at 1 TPY or more) or *worst-case* scenario:

Toxic Contaminant: xylene (worst case; also toluene and MIBK)

TLV (mg/m³): 435

Maximum Hourly Emission Rate (lb/hr): 17.40

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,420

MAGLC (µg/m³): 10,357

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K001-K004, K006, and P001, combined, calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the EUs that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the EUs or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EUs described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (6) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
 - a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EUs or the materials applied.
 - (7) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation of coating usage in emissions units K001-K004, K006, and P001, combined;
 - ii. all exceedances of the VOC content limitations on the coatings and clean-up materials employed in emissions units K001-K004, K006, and P001;
 - iii. all exceedances of the individual HAP content limitation on the coatings employed in emissions units K001-K004, K006, and P001;
 - iv. all exceedances of the rolling, 12-month VOC emissions limitation;



- b. The probable cause of each deviation (excursion).
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (3) The permittee shall include any changes made to a parameter or value entered into the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, EUs or the exhaust stack(s) have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation

VOC emissions shall not exceed 4.07 tons per year from all coatings mixed and clean-up materials employed in this emissions unit.

Applicable Compliance Method

The annual emissions limitation was established to reflect the potential to emit, taking into account the federally enforceable gallon usage restrictions and VOC content restrictions as follows:

Annual VOC emissions = $\frac{[(\text{coating material usage}) \times (\text{VOC content of coating}) \times (\text{EF})] + [(\text{clean-up material usage}) \times (\text{VOC content of clean-up material})]}{(2,000 \text{ lb/ton})}$, where:

Coating material usage = maximum annual usage (8,750 gal)

VOC content of coating = maximum VOC content (6.59 lb VOC/gal)

EF = emission factor for evaporative losses from paint mixing (0.1 lb VOC/lb VOC in gallon)

Clean-up material usage = maximum annual usage (350 gal)

VOC content of clean-up material = maximum VOC content (6.8 lb VOC/gal)



b. Emissions Limitation

VOC emissions from K001-K004, K006, and P001, combined, shall not exceed 30.02 tons per year from coating and clean-up material usage based on a rolling, 12-month summation of the emissions.

Applicable Compliance Method

Compliance with this emissions limitation shall be demonstrated through the recordkeeping requirements established in d)(2) above.

g) Miscellaneous Requirements

(1) None.